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December 20, 2000

Project Number N5278

Ms. Kimberlee Keckler
U.S. Environmental Protection Agency
Federal Facilities Superfund Section
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Reference. CLEAN Contract No. N62472-90-D-1298
Contract Task Order 0218

Subject: Response to EPA's Comments on the Revised Draft Final Remedial Investigation Report
Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island
Received in EPA letter to James Shafer of the U.S. Navy, November 20, 2000

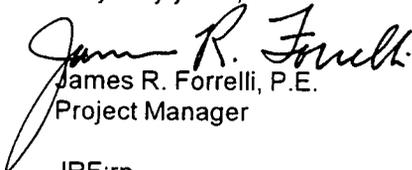
Dear Ms. Keckler:

The Navy has reviewed the comments provided by EPA on the Revised Draft Final Remedial Investigation Report for the Old Fire Fighting Training Area site. The responses to EPA's comments are provided in Attachment A (two copies). EPA's comments are presented verbatim in italic type followed by the Navy's response in standard type. Comments contained in the EPA's cover letter have been itemized and presented as general comments. The report is being revised to address the comments.

In the cover letter you state your concern that the Remedial Investigation underestimates site risks, however the detailed comments do not seem to raise issues that would indicate an underestimation of risks. The risk assessment was prepared in accordance with EPA Region I guidance as modified for the OFFTA Site in discussions between the Navy and EPA. As part of the risk assessment, the Navy transmitted tables that defined the exposure parameters agreed upon with EPA. As indicated above, responses to specific comments are presented in Attachment A and revisions to the report are being prepared in accordance with the responses.

Please contact me or Jim Shafer of the Navy if you have any questions about this transmittal or would like to discuss this matter further.

Very truly yours,


James R. Forrelli, P.E.
Project Manager

JRF:rp

Enclosure

c: J Shafer, NORTHDIV (w/enc. - 3)
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File N5278-8.0 (w/enc.)/File N5278-3.2 (w/o enc - 2)

ATTACHMENT A
Responses to Comments from the
U.S. Environmental Protection Agency
Old Fire Fighting Training Area Revised Draft Final RI (October 2000)
Comments dated November 20, 2000

General Comments

No. Comment/Response

1. *Comment: The Draft Final Remedial Investigation for the Old Fire Fighting Training Area has neglected to discuss the conclusions based on the conceptual understanding of the site. The final objective of a Remedial Investigation is to characterize the nature and extent of contamination such that informed decisions can be made as to the level of risk presented by the site and the need for a remedial response. Section 8.0 of the report should include the data limitations, uncertainty, and recommendations for further characterization or recommendations for conducting a Feasibility Study, as appropriate.*

Response: Section 8.0 will be revised to include discussions of the data limitations and uncertainty, recommendations for further characterization and recommendations concerning a Feasibility Study

2. *Comment: Various sampling methodologies were implemented during sample collection for the different data sets. For instance hand bailers were used to collect groundwater samples during the Phase II RI and the USEPA Region I Low Stress (low flow) Purging and Sampling Procedure (July 30, 1996), methodology was followed when collecting groundwater samples as part of the Phase III groundwater investigation. As a result, the report should discuss what precautions were made to ensure the representativeness and comparability of the data from each data set. When evaluating analytical data collected using different sampling methodologies apparent trends in data may not be representative or obvious. For example, analytical data from sampling events that used a teflon bailer should be approached with considerable caution. In particular total inorganics concentrations are likely to be strongly influenced by turbidity, which is difficult to control when sampling with a hand bailer as was the case during the Phase I and Phase II groundwater investigation. This was observed in the turbidity measurements from the Phase II groundwater investigation in which turbidity values ranged from 110 NTU to greater than 1,000 NTU.*

Response An evaluation of groundwater metals results will be conducted by reviewing. (1) sampling technique (bailers vs. low-flow sampling); (2) type of analysis (total metals vs. dissolved/field-filtered metals), (3) associated turbidity data; and (4) sample location, for each of the three groundwater sampling events (Phase I, Phase II, and the Source Removal Evaluation sampling event) An evaluation of the resulting impact on the groundwater data and the data use will be presented.

3. *Comment: Also, the report should discuss whether the laboratory analytical procedures, method detection limits, holding times were evaluated over the ten-year span when data was collected, to ensure the various data sets were analyzed in the same manner and are in fact representative and comparable*

Response The report will be revised to include an evaluation of laboratory analytical procedures, method detection limits, and holding times over the project time frame for representativeness and comparability of the data sets.

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4. Comment: EPA Region 3 Residential Risk-based Concentrations (RBCs) were used during the screening process to select Chemicals of Potential Concern (COPCs) in the human health risk assessment. While these values are appropriately conservative, EPA Region 1 guidance (EPA, August 1995) requires the use of EPA Region 9 Preliminary Remediation Goal (PRG) values for screening in the COPC selection process. Please provide rationale for using Region 3 rather than Region 9 screening values.

Response: Before beginning the risk assessment, a meeting was held to agree upon the technical approach. It was agreed that Region 3 RBCs would be used for the recreational risk assessment performed for the OFFTA/Katy Field site. The final OFFTA risk assessment also used Region 3 RBCs to be consistent with this initial agreement and the previous risk assessment. In the recent Region 1 guidance, note that the Region 9 PRGs are presented as "recommended" but not mandatory screening criteria.

5. Comment: Several chemicals were not retained as COPCs for the human health risk assessment due to lack of toxicity data and/or screening concentration. These chemicals are identified as not being retained with a rationale of "NTX" in the screening tables. EPA Region 1 guidance (EPA, August 1995) requires that chemicals without toxicity data be retained as COPCs and evaluated qualitatively. All chemicals currently not retained with a rationale of "NTX" should be retained as COPCs and evaluated qualitatively in the human health risk assessment.

Response: Chemicals listed with an NTX are addressed qualitatively in the risk assessment. These chemicals are shown on the RAGS D Table 2s and are discussed in the uncertainty section, separately for each medium and each chemical. The Table 7s and Table 8s do not contain these chemicals because it was not possible to calculate risk in the absence of an accepted toxicity factor. A note will be added to the risk characterization to point the reader to the uncertainty section for the qualitative evaluation of risk for chemicals categorized as "NTX".

6. Comment: Several chemicals were not retained as COPCs for the human health risk assessment based on a statistical comparison to background. These chemicals are identified as not being retained with a rationale of "BKG" in the screening tables. As you know, EPA Region 1 guidance (EPA, August 1995) does not allow for elimination of chemicals during the screening process based on comparison to background. EPA's national guidance regarding the use of background data in a risk assessment will be issued shortly. The background comparison step should be used in the risk management process after the risk evaluation has been completed. All chemicals currently not retained with a rationale of "BKG" should be retained as COPCs and evaluated quantitatively in the human health risk assessment. It is important to characterize all risks at the site for the community, including those risks from background. Sections 1.1 (b), 2.6, and 6.1 of the Federal Facilities Agreement require that remedial investigations under CERCLA are conducted in accordance with EPA regulations, policy, and guidance.

Response: In accordance with policy issued by the Chief of Naval Operations (CNO), inorganic COPCs that were not statistically above background were eliminated from the human health risk assessment. This approach is explained in the Navy Interim Final Policy on the Use of Background Levels.

7. Comment: On page 6-6, it is stated that Central Tendency Exposure (CTE) calculations will only be presented for certain receptors. The discussion indicates that the rationale for conducting CTE evaluations is provided in Section 6.7.0. However, the referenced section does not include the rationale for conducting CTE evaluations in specific circumstances. Please include a discussion explaining the rationale and conditions for conducting CTE evaluations and how the CTE information will be used.

Response: The discussion on page 6-6 will be revised. The rationale for conducting CTE is presented on this page rather than in Section 6.7.0.

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8. *Comment: An Executive Summary has not been included in this document. Please provide an Executive Summary for this document.*

Response: The requested Executive Summary will be prepared and added to the text.

Specific Comments

<u>No</u>	<u>Page</u>	<u>Comment/Response</u>
1.	p 1-13, §1 4 2	<p><i>Comment: Upon closure of the Fire Fighting Training Area (FFTA) the on-site structures were demolished and buried. The report does not specify whether the oil water separators and associated underground piping, discussed in this section, were included in the debris that was buried on-site. Please provide the disposition of these underground storage tanks and associated underground piping. Alternatively, the report should recommend studies to evaluate the central drumlin on-site or other suspected burial areas.</i></p> <p>Response: Additional communications with the Navy and records review will be conducted to attempt to provide the disposition of the previous oil-water separator and associated underground piping. This issue may be further investigated as part of any site remediation activities.</p>
2	p 2-17, §2 2.4.2	<p><i>Comment: A 4-inch clay pipe containing approximately one inch of a black oily sludge material was observed at the ends of test pit samples TP-1A and TP-1C at a depth of 4 feet. As part of the Phase II Investigation, a sample of the sludge was collected for analysis and the clay pipe was plugged using absorbent pads, before backfilling TP-1. Analytical results from the oily sludge sample exhibited elevated concentrations of total PAHs (156,900 ppb) and bis(2-ethylhexyl)phthalate (12,000 ppb). To ensure that the sludge material observed in TP-1 has not leached from the absorbent pads into the underlying soils and groundwater I recommend that an additional subsurface soil sample be collected in the vicinity of TP-1 at a depth just underlying the pipe. Additionally, I recommend that further evaluation of the historical use and layout of the clay pipe be conducted as well as an evaluation of the possibility of pipe materials leaching into the underlying subsurface.</i></p> <p>Response: Additional sampling and investigation of soils adjacent to the clay pipe, including the location of black oily sludge material sampled in TP-1A, will be conducted as part of a feasibility study or site remediation.</p>
3.	p 2-25 §2.3 2 1	<p><i>Comment: The excavation of test pit TP-4 was reportedly halted owing to the presence of a potentially asbestos-containing material. The text should discuss the actions that were taken to verify the composition of this material (i.e., sampling) and should discuss the disposition of the material. Also, the report does not specify whether the black oily sludge observed in the clay pipe located adjacent to TP-1 was observed in the clay pipe encountered during the excavation of test pit TP-12. If the oily sludge material was observed in the clay pipe adjacent to TP-12, the text should include what actions were followed to contain the substance and if the material was analyzed.</i></p> <p>Response: The report will be revised to discuss the actions taken during the excavation of TP-4 with regard to the potentially asbestos-containing material. In addition, the report will be revised to discuss observations and actions during the excavation of TP-12 with regard to black oily sludge.</p>

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4. p. 2-27, §2.3 3.1 Comment: The text states that "Potential till-like layers" were encountered at refusal depths during the installation of monitoring wells MW-101 and MW-102. It is unclear why the text references this lithology as potential till-like, when the boring logs for MW-101 and MW-102 have identified this material as till. This discrepancy should be clarified. Also, the first and second sentences of the third paragraph are repeated and should be removed

Response: The text will be revised to reference this material as till.

- 5 p 2-30, §2 3.5 *Comment: According to the text, storm sewer sample SW-2 was collected from a manhole on the western side of the central mound. Figure 2-13 however, shows the location of SW-2 at a catch basin located to the southwest of Building 144 and the location of storm sewer sample SW-1 on the western side of the central mound. This discrepancy should be corrected. In addition, the text should describe the methodology that was used to collect aqueous samples from each manhole/catch basin at the site.*

Response The discrepancy will be corrected to clarify the locations of SW-1 and SW-2. In addition, the methodology that was used to collect aqueous samples from each manhole/catch basin at the site with be provided.

- 6 p 2-31, §2 4.1 Comment: Surface soil samples were collected from 32 locations during the Phase III Remedial Investigation. From these 32 samples four were selected and analyzed for dioxins/furans. The text should provide the criteria that were used to select samples for dioxins/furans analysis.

Response. The text will be revised to provide the criteria used to select samples for dioxins/furans analysis.

- 7 p 2-31, §2 4 2 Comment: The first sentence in this section reads "Sediment samples were collected from 5 locations (SSD-32 - SSD-37) along the shoreline." Sediment samples SSD-32 through SSD-37 consists of 6 locations. This discrepancy should be corrected.

Response: Sediment samples were collected from five locations (SSD-333 – SSD-337). (There was no sample SSD-332) The typographical error will be corrected.

- 8 p. 3-9, §3.2 2 Comment: The fill layer has been described as present throughout most of the site and ranging in thickness from 0.5 feet to more than 20 feet. It is stated in the text that this RI does not specifically address the characteristics of the fill material, or the potential for leaching contaminants from the fill material into groundwater. The text should provide an explanation for excluding this information in the report.

Response. The sentence "This RI does not specifically address the characteristics of the fill material, or the potential for leaching contaminants from the fill materials into groundwater." Was inadvertently included and will be deleted.

- 9 p 4-4, §4 1 1 Comment: According to the text, methylene chloride was detected in five subsurface soil samples. Table 4-2 however, shows that methylene chloride was detected in six subsurface soil samples. This discrepancy should be corrected.

Response Table 4-2 is correct, the text will be changed to reflect that methylene chloride was detected in six subsurface soil samples.

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10. p. 4-5, §4.1.2 *Comment: It is stated in the report that SVOC concentrations, other than CaPAHs, detected in surface and subsurface soil samples were less than the RIDEM Residential Direct Exposure Criteria and the RIDEM GB Leachability Criteria. The RIDEM GB Leachability Criteria for surface and subsurface soils should be added to the corresponding Table 4-2 for comparative purposes.*

Response: There are no RIDEM GB Leachability Criteria for SVOCs. The phrase " and the RIDEM GB Leachability Criteria" will be deleted from the text both for surface soils (p 4-4 and subsurface soils (p.4-5).

Comment: In addition, the last paragraph of this section discusses the analytical results of the oily sludge sample collected from the clay pipe encountered during the excavation of test pit TP-1. This analytical data however is not presented on the corresponding tables. This information should be added to the table.

Response: The analytical results of the oily sludge sample collected from the clay pipe were not included in Table 4-2 because these results do not represent subsurface soils. Following collection of the sample the pipe was sealed to prevent movement of the contents into surrounding soils. The analytical results of the oily sludge sample will be added to Appendix L along with Test pit, groundwater, and storm water results inadvertently omitted. The oily sludge sample is designated TP-11 in Appendix L-3 and will be so referenced in the text. Since this is only one sample a summary table seems unnecessary.

11. p 4-8, §4.1.3 *Comment: According to the text, Table 4-2 presents a comparison of the PCB concentrations detected in the site subsurface soil with the RIDEM soil action levels. Table 4-2 however, does not include the RIDEM Residential Direct Exposure Criteria. The subsurface soils action levels for PCBs should be added to Table 4-2.*

Response: The RIDEM Residential Direct Exposure Criteria and the RIDEM GB Leachability Criteria for PCBs will be added to Table 4-1 and 4-2.

12. p 4-11, §4.1.6 *Comment: Analysis for TPH was conducted during the Source Removal Evaluation with the collection of 14 subsurface soil samples. According to the text, subsurface soil samples analyzed for TPH during this investigation included " .one soil sample from each of the 12 test pits (all test pits except TP-01, TP-03, TP-09 and TP-10) " as well as monitoring wells MW-101 and MW-102. It is unclear what is meant when the text states "all test pits except TP-01, TP-03, TP-09 and TP-10" since a total of 14 subsurface soil samples were collected. This statement should be clarified.*

Response: The text will be clarified by listing the twelve test pits sampled rather than those not sampled. The two additional subsurface soil samples were obtained from soil borings at monitoring wells MW-101 and MW-102.

13. p 4-14, §4.2.2 *Comment: Benzo(a)pyrene was detected in groundwater samples collected from MW-2S and MW-11S. According to the text, these are the only two locations with detected benzo(a)pyrene concentrations in groundwater. However, according to Table 4-3 benzo(a)pyrene was detected in three groundwater samples. This discrepancy should be corrected.*

Response: Benzo(a)pyrene was detected in three groundwater samples, however two samples were obtained from the same location (MW-2, sampled in 1990, and at the same location but identified as MW-2S, sampled in 1994). The text will be changed to clarify this.

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14. p 4-15, §4.2.4 *Comment* According to the text, the metals most common to the groundwater samples collected on the site include aluminum, barium, calcium, cobalt, iron, lead, magnesium, manganese, potassium, sodium, and zinc. Chromium should also be added to this list since it was detected in 27 of the 29 groundwater samples collected.

Response: Chromium will be added to the text.

15. p 4-16, §4.2.4 *Comment: A comparison of the filtered versus the unfiltered samples results, according to the text, indicated that the inorganic concentrations in the filtered samples are generally far below the concentration of the unfiltered samples. The text includes a list of metals that did not have significantly different concentrations between filtered and unfiltered samples. These metals included calcium, potassium, magnesium, manganese, and sodium. The text however, does not indicate that antimony was detected in the filtered sample at a higher concentration (212 µg/L) than the unfiltered sample (37.5µg/L), as shown in Table 4-3. This should be addressed in the report.*

Response: A comment will be added to the text pointing out that antimony was detected at a higher concentration in filtered groundwater than in unfiltered groundwater. It should be noted that the maximum concentrations of antimony in filtered and unfiltered groundwater samples were obtained from different locations.

16. p. 4-18, §4.3.2 *Comment. Bis(2-ethylhexyl)phthalate was detected in all four storm sewer samples collected. It is stated in the text that bis(2-ethylhexyl)phthalate was detected in each sample at a concentration of 3 ppb. Table 4-4 however, shows that bis(2-ethylhexyl)phthalate concentrations range from 2 ppb to 3 ppb. This discrepancy should be corrected.*

Response: Bis(2-ethylhexyl)phthalate was detected in two storm water sewer samples at 2 ppb and two samples at 3 ppb. The text will be corrected accordingly.

In addition, the AWQC levels for bis(2-ethylhexyl)phthalate and phenanthrene discussed in the text are not included in the corresponding Table 4-4. This information should be added to the table.

Response: The December 1998 Federal Register Vol 63, No 237 pp 68354-68364, listing of National Recommended Water Quality Criteria lists no water quality criteria for either Bis(2-ethylhexyl)phthalate or phenanthrene. For this reason, reference to AWQCs for these contaminants will be removed from the text.

17. p 4-19, §4.3.4 *Comment: According to the text, chromium and vanadium were detected in two of the four storm water samples. Arsenic was also detected in two of the four storm water samples and should be included in the text. In addition, the text states that nickel exceeded the marine chronic AWQC of 8.3 ppb in sample ST-1 and that the marine acute AWQC for copper is 2.9 ppb. Table 4-4, however shows the marine chronic AWQC value for nickel as 8.2 ppb and the marine acute AWQC for copper as 4.8 ppb. These discrepancies should be corrected.*

Response: Arsenic will be added to the list of contaminants detected in two of the four storm water samples.

The marine chronic AWQC for nickel will be changed in the text to 8.2 ppb as presented in Table 4-4. The marine acute AWQC for copper will be changed in the text to 4.8 ppb as presented in Table 4-4.

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18. p. 4-18,
§4.3 2 *Comment: The first sentence in the second paragraph of this section reads "Sediment samples were collected from 5 locations (SSD-32 - SSD-37)." Sediment samples SSD-32 through SSD-37 consists of 6 locations. This discrepancy should be corrected.*
- Response: Sediment samples were collected from five locations (SSD-333 – SSD-337). (There was no sample SSD-332) The typographical error will be corrected.
19. p. 5-5,
§5 2 *Comment: Please verify the units for analytical data presented in this section There appears to be a mix up with symbol codes. For instance, the maximum ethylbenzene concentration detected in soil is presented in the text as "630 □g/kg."*
- Response. This was a typographical error that occurred during word processing of the document. The "□g/kg" will be revised to ug/kg (micrograms per kilogram).
- 20 p 6-23,
§6 4.9 *Comment: This section indicates that the screening and toxicity values for naphthalene were used as a surrogate for acenaphthylene, benzo(g,h,i)perylene and phenanthrene However, the screening tables do not use the naphthalene screening value as a surrogate for these compounds. Please correct this discrepancy in all screening tables.*
- Response: Tables will be modified to use the surrogate screening value for naphthalene as indicated in the text.
21. Tables
6-2.1 to
6-2 6 *Comment: All of these tables have a footnote 3 that reads "Provide reference for screening toxicity value." Please replace this statement with the specific references for all screening toxicity values. Also, indicate where surrogate chemicals have been used*
- Response: The footnote will be replaced with a specific reference to the source of the RBCs used
22. Tables
6-2.1 &
6-2.2 *Comment: These tables indicate that selenium is not being retained as a COPC based on a background companson. However, Tables P-18 and Q-19 in Appendix Q-3 indicate that there is no background value for selenium. Please correct the rationale for retention/elimination of selenium in Tables 6-2.1 and 6-2.2*
- Response The tables in question do not indicate that there are no background values for selenium; rather, it is seen that all background results were non-detected. Non-detected selenium results were used in performing certain types of statistical tests. Table Q-19 indicates that selenium is not above background based on the upper ranks test (also called the quantile test), which determined that ranked data did not reveal any instances where an unusual proportion of high concentration samples occurred in the site data set but not in the background data set.
- 23 Tables
6-5 1 & 6-6 1 *Comment: These tables provide a dermal absorption value (ABS) for cadmium of 0 001 with a reference of EPA, 1998 (Interim Dermal Guidance). However, the cadmium ABS value in the cited reference is 0 01 Both EPA, 1992 and EPA, 2000 dermal guidance support using a cadmium ABS value of 0 001. Therefore, only reference cited for this value should be corrected*
- Response The reference for cadmium will be corrected

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24. Tables 6-5.1 & 6-6.1 *Comment: As a footnote to these tables, please provide the reference used for the oral to dermal adjustment factors. The oral to dermal adjustment factors for arsenic and cadmium could not be verified using the reference cited in the text.*

Response: The reference for arsenic will be changed to "Wester et. al, 1993" The references for cadmium will be changed to "Wester et al, 1992", and "USEPA, 1992".

25. Table 6-5.1 *Comment: There were several errors/omissions in this table. The manganese oral RfD for non-food/soil should be 2.0E-02. The toxicity information for silver has not been completed (i.e., chronic/subchronic, target organ, UF/MF, and date). Please indicate that alpha chlordane was used a surrogate for trans-nonachlor.*

Response The 0.07 oral RfD for manganese in soil is correct. This value was derived by subtracting the dietary (food) contribution according to Region I Risk Update No 5, September, 1999. The trans-nonachlor surrogate compound will be footnoted

26. p. 7-1, §7 0 *Comment: This section provides a summary of the marine ecological risk assessment (ERA) for OFFTA. The third paragraph on this page provides two bulleted items that are stated to be the objectives of the marine ERA taken directly from the ERA Report While these two bulleted items are correct, a third objective that is presented in the ERA Report has been omitted from the RI Report. This third objective is, "Support communication to the public of the nature and extent of ecological risks associated with Old Fire Fighting Training Area." This third objective should be included in Section 7.0 of the RI Report*

Response. The additional objective listed above will be added to the text.

27. Table P-18, App Q *Comment: Table P-18 in Appendix Q-3 should be titled "Table Q-18."*

Response. The typographical error will be corrected

28. Table Q-19, App Q *Comment: Table Q-19 in Appendix Q-3 indicates that detected concentrations of selenium in subsurface soil at the site are not greater than background concentrations. However, selenium was not detected in background subsurface soils Please correct this table to reflect that selenium subsurface concentrations at the site are indeed greater than background subsurface concentrations.*

Response: The table in question does not indicate that there are no background values for selenium; rather, it is seen that all background results were non-detected. Non-detected selenium results were used in performing certain types of statistical tests Table Q-19 indicates that selenium is not above background based on the upper ranks test (also called the quantile test), which determined that ranked data did not reveal any instances where an unusual proportion of high concentration samples occurred in the site data set but not in the background data set.

29. p 8-7, §8 7 *Comment The text makes a statement that off-site sources are probably a major contributor to the high chromium concentrations observed in marine sediments The text should provide the rational for this statement.*

Response. The rational for this statement is provided in Section 5.4, p 5-8 in the chromium fate and transport discussion

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- 30 Table 3-5 Comment The ground surface elevations presented for monitoring wells in Table 3-5 differ from those presented in Table 2-6. Please provide an explanation for these variations.

Response. The reason for the difference in ground surface elevations presented in the two tables is that the wells and respective ground surface elevations were resurveyed prior to the collection of data presented on Table 3-5. The revised ground surface elevations from the most recent survey data were then used to generate the data on Table 3-5. A note of explanation will be provided on the two tables.

- 31 Table 4-4 Comment: Dieldrin was detected in two storm sewer water samples including ST-1 detected at a concentration of 0.0058 µg/L, and ST-2 detected at a concentration of 0.016 µg/L. The number of storm sewer water samples greater than the marine AWQC chronic values for dieldrin (0.0019 µg/L) presented in the table should be changed from 1 to 2 samples.

Response The table will be corrected.

32. Figure 3-5 through 3-9 Comment The arrows that are assumed to depict groundwater flow direction should be identified in the legend.

Response: The arrow will be identified as the indicator of groundwater flow direction in these figures.

33. Figures 3-10 Comment: It is unclear why there are two separate 4.5 groundwater contours. The 4.5 groundwater contour line adjacent to monitoring well MW-6S should be removed from the figure.

Response: The above-referenced groundwater contour will be removed.